

ATTACHMENT 16

THE CAMDS Site Monitoring Plan

August 2007

10.0 FAILURE TO MONITOR

All of the monitoring identified in this plan must be operating and in control during processing in a given area or it will be considered a "Missed Monitoring" and shall be reported as such, in writing to the Executive Secretary. The following are exceptions are allowed for all monitors except for the HVAC and MPF Stack.:

1. During campaign change transition periods when monitors are being changed to a new campaign.
2. When a Temporary Change has been approved (see Section 12.0).
3. When there are NRT monitors and DAAMS monitoring at a work area, and one or the other is off line for maintenance, repair or calibration, it will not be considered a "Missed Monitoring" as long as the co-located monitor is in control. If the NRT monitor is offline or in malfunction for more than one and a half hours, the DAAMS becomes the primary monitor and therefore must be analyzed.
4. When a monitor is off line or out-of-control and processing has ceased, personnel have evacuated the area, or other investigative measures are taken, it will not be considered a "Missed Monitoring". Example: If an NRT monitor is offline or a line challenge has failed and the CMO/EOC has made the area off limits, it will not be considered a missed monitoring because mitigating measures have been taken.

10.1 HVAC and MPF Stack

Missed monitoring shall be reported for the HVAC stack when the NRT monitoring is offline for more than ~~five~~ ten cycles. Missed monitoring shall be reported for the HVAC stack if DAAMS tubes are not continuously monitoring the HVAC stack.

Missed monitoring shall be reported for the MPF stack if any of the conditions required by Section 6.1.7 of this Attachment are not met.

11.0 NRT MONITOR ALARMS AND NOTIFICATION PROCEDURES

All NRT monitor alarms, which have co-located DAAMS, require analysis of the DAAMS tube(s). Even if the alarm is not confirmed, all DAAMS results must be reported to the CMO/EOC and entered in the DAAMS Log Book. The CAMDS Laboratory will maintain the official record of all DAAMS results.

Data from each NRT monitor is collected and stored in a computer file. These readings may be displayed on demand in the CMO/EOC. Alarm notification is indicated when agent concentrations meets or exceed alarm set points at stations outside of toxic areas or when the NRT monitor is in malfunction.

In the event of an NRT monitor alarm at or above the alarm level or a reading in excess of the action level of 0.2, outside of engineering controls, or in category "C" areas, the CMO/EOC will notify the Monitoring Team Leader or designee and record the information in the CMO/EOC Log book. The Team Leader or designated certified monitoring technician along with one other monitoring person shall respond by going to the location of the NRT monitor that is in alarm.

Monitoring personnel evaluate alarms by observing the chromatogram and troubleshooting for malfunctions, verify the action level set point, and challenging the NRT monitor with an agent standard to ensure that it is operating correctly and pull the associated DAAMS tubes for analysis.

If the alarm is confirmed by DAAMS, appropriate corrective measures shall be taken, and two successive cycles, less than the action level, on the NRT monitor shall be used to determine that operations may resume (not applicable to the MPF stack MDC2 or filters).

The Permittee must notify the Executive Secretary within seven (7) days after a confirmed breakthrough of chemical warfare agent at or above the WPL, after carbon bank number two of any of the site HVAC filter units. Within thirty (30) days from the time of the confirmed breakthrough, the Permittee must begin operations to replace carbon banks one and two in that unit; and either replace carbon bank number three or move carbon from bank number three up to the number one position.

- II.N.2.b For HVAC filter units dedicated for the ventilation of the CAMDS laboratory and agent room only (Filter No. 5, 6, 7, 12):

The Permittee must notify the Executive Secretary within seven (7) days after a confirmed breakthrough of chemical warfare agent at or above the WPL, after the first carbon bank of any of the lab HVAC filter units. Within thirty (30) days from the time of the confirmed breakthrough, the Permittee must begin operations to replace both carbon banks in that unit.

- II.N.3. If a confirmed detection of agent above the STEL occurs in the exhaust stack of a filter unit, airflow will be immediately redirected to a backup filter unit and the original filter unit shut down. If a backup filter is not available, the Permittee will stop operations until both a primary and backup filter system are available. The Permittee shall report confirmed agent concentrations above the STEL in accordance with the requirements of condition I.T.

- II.N.4. CAMDS will run an initial monitoring baseline test for the primary agent on all filter stacks for 20 out of 30 calendar days. Upon successful completion of the initial baseline all filter stacks will be considered as one group. QP tubes will be placed on one stack daily. The QP station will be assigned to a different stack each week.

- II.N.5. When the HVAC stack NRT Monitor is offline for more than ~~five~~ ten instrument cycles the DAAMS tubes monitoring the HVAC stack will be pulled and analyzed at the STEL level, as soon as the NRT Monitor is back online. The aspiration time used in the analysis shall be equal to the total time the NRT monitor was off line, and agent is confirmed if the detection level is greater than or equal to the reporting limit (RL). HVAC NRT monitors shall not be taken offline, except for agent challenges/calibrations or instrument equipment repairs without prior approval of the Executive Secretary.